



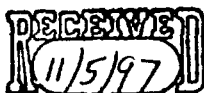
**GUMTECH INTERNATIONAL INC.**

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October 31, 1997

Dr. Carolyn Miles  
Special Nutritionals  
Center for Food Safety & Applied  
Nutrition  
FDA  
200 C St. S.W.  
Washington, D.C. 20204

Dear Dr. Miles:

This is a 30-day notification for a dietary supplement chewing gum which will be on the market within 30 days. The product name is NuGum™ Calcium Gum. The claims on the sales sheets are:

- Calcium to build bones and increase bone thickness as well as to prevent bone loss or thinning

-Vitamin D to help absorb calcium

-Boron to aid in reducing calcium loss

-A modern and highly efficient nutrient delivery system for taking dietary supplements

The claims on the 12-count package is the exact statement as found in the CFR for an calcium/osteoporosis claim.

-Regular exercise and a healthy diet with enough calcium helps teen and young adult and Asian women maintain good bone health and reduce their high risk of osteoporosis later in life. calcium builds strong bones and teeth.

-Adequate calcium intake is important, but daily intakes above about 2,000 mg are not likely to provide any additional benefits.

Sincerely,

Cecile Kehoe/Regulatory Manager

*Cecile Kehoe*

975-0162

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